

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

IN RE: )  
Sally Jo Hummelgaard-Lawson, ) Case No. 17-42999-can  
) Chapter 13  
)  
Debtor. )

**MOTION FOR SUSPENSION OF CHAPTER 13 PLAN PAYMENTS**

COME NOW Debtor, Sally Jo Hummelgaard-Lawson, by and through their attorney of record, Susan Bratcher, hereby applies for a suspension of her Chapter 13 Plan Payments for the following reasons:

1. On November 3, 2017, Debtor filed a Chapter 13 Bankruptcy Petition.
2. That the Debtor has had a reduction in income due to the COVID-19 pandemic. Debtor has had nonpaying tenants and a pending eviction on her tenant at 6 Mimosa Court, Belton, Texas 76513. The court in Texas will reopen this month. Debtor has had a reduction in her ride sharing business also due to the COVID-19 pandemic.
3. That since the filing of the Trustee's motion, the Debtor has made plan payments of \$1,611.00 in June 2020.
4. That the Debtor will file a Motion to Modify Chapter 13 Plan Under 11 U.S.C. § 1329(d) – CARES Act and file a proposed amended plan. Debtor will amend the plan to decrease the payment to \$8,000.00 beginning July 2020 and continuing through the end of the plan.
5. That the Debtor will seek to suspend the remaining delinquent payments. The Debtor's counsel has calculated that with the suspension of payments, the plan length will calculate to run 80 months.
6. That the Debtor is requesting a suspension of the remaining plan payment delinquency of \$39,249.00.

WHEREFORE, the Debtor prays that this Honorable Court suspend her Chapter 13 Plan Payments in the amount of \$39,249.00, and for such other relief that the Court deems just and proper.

Date: June 24, 2020

/s/ Susan Bratcher  
Susan Bratcher #43944  
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ATTORNEY FOR DEBTOR(S)

**NOTICE OF MOTION**

Any response to the motion must be filed with 21(twenty-one) days of the date of this notice, pursuant to Local rule 9013-1C, with the Clerk of the United States Bankruptcy Court. Parties represented by an attorney shall file electronically at <https://ecf.mowb.uscourts.gov>. Pro se parties shall mail filings to: United States Bankruptcy Court, Western District of Missouri, 400 East 9<sup>th</sup> Street, Room 1510, Kansas City, MO 64106. Pursuant to 9013-1D, responses shall address the merits of the motion and, if applicable, set out actions to remedy the particular problem. The Court will serve such response electronically on the Trustee, debtor's attorney and all other parties to the case who have registered for electronic filing. Respondent shall serve all parties who are not served electronically.

If a response is timely filed, a hearing will be held on a date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no response is filed within 21 days, the Court will enter an order.

For information about electronic filing go to [www.mow.uscourts.gov](http://www.mow.uscourts.gov) or call the Court's HELP line at 1-800-466-9302.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2020, all appropriate parties will be served either electronically or by U.S. Mail including all creditors.

Richard Fink, Trustee  
All creditors

/s/ Susan Bratcher  
Susan Bratcher #43944